

CHAITMAN LLP

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Attorneys for Defendants

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff

Plaintiff,

v.

TRUST U/ART FOURTH O/W/O ISRAEL
WILENITZ, EVELYN BEREZIN WILENITZ,
individually, and as Trustee of the Trust U/ART
Fourth O/W/O Israel Wilenitz, and SARA SEIMS, as
Trustee of the Trust U/ART Fourth O/W/O Israel
Wilenitz,

Defendants.

Adv. Pro. No. 10-04995 (SMB)

NOTICE OF REQUEST TO DEPOSE BERNARD L. MADOFF
ON "DAY TWO TOPICS"

PLEASE TAKE NOTICE, that pursuant to the Order Authorizing the Deposition of Bernard L. Madoff [Docket No. 14213] (the “Order”), the Defendants listed on Exhibit A hereto, represented by Chaitman LLP, seek permission to depose Bernard L. Madoff (“Madoff”) on “Day 2” of the deposition as defined in the Order on the following subjects as they relate to each Defendant’s account:

1. The extent to which Madoff or Bernard L. Madoff Investment Securities LLC (“BLMIS”) bought, sold, and held actual securities shown on the customer statements.
2. The extent to which Madoff or BLMIS used customer funds to purchase securities shown on the customer statements.
3. The redacted FBI 302 recently produced by the Trustee.
4. Madoff’s relationship with FISERV.
5. The indemnification agreements Madoff had with the Four Families.
6. The involvement of various Madoff personnel in the handling of each Defendant’s account.
7. Other questions that may arise as Defendants’ counsel reviews the hundreds of thousands of pages of Madoff trading records that were first produced by the Trustee in 2017.

Dated: New York, New York
May 30, 2017

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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